

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

AVIVA USA CORPORATION,

Plaintiff,

v.

PHYLLIS R. STEVENS AND MARLA R.  
STEVENS,

Defendants

Case No. 4:09-cv-00388-JEG

ANSWER

COMES NOW, Defendant, Marla R. Stevens, by and through her attorney, Michael J. Burdette and for her Answer to the Complaint states:

1. Each and every allegation of paragraph 1 is denied for lack of information upon which to form a belief.

2. Each and every allegation of paragraph 2 is denied for lack of information upon which to form a belief.

3. Defendant, Marla Stevens, admits that from time to time, she has visited Defendant, Phyllis Stevens, in Polk County, Iowa and has represented that she does have a mailing address at the residence of her wife, Defendant, Phyllis Stevens in Polk County, Iowa. Marla Stevens had not traveled to Polk County, Iowa after Spring 2004 until October 1, 2009. Defendant, Marla Stevens denies each and every other allegation set forth in paragraph 3.

4. Defendant, Marla Stevens, denies each and every allegation of paragraph 4 for lack of information upon which to form a belief.

5. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 5 for lack of information upon which to form a belief.

6. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 6 for lack of information upon which to form a belief.

7. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 7 for lack of information upon which to form a belief.

8. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 8 for lack of information upon which to form a belief.

9. Defendant, Marla Stevens, admits that Phyllis Stevens has been employed by Aviva or its predecessor, Indianapolis Life, and that Phyllis Stevens has resided in central Iowa. Defendant, Marla Stevens, denies each and every other allegation of paragraph 9 for lack of information upon which to form a belief.

10. Defendant, Marla Stevens, denies each and every allegation of paragraph 10 for lack of information upon which to form a belief.

11. Defendant, Marla Stevens, admits that she is not nor has been an insurance agent associated with Aviva, but denies each and every other allegation of paragraph 11 for lack of information upon which to form a belief.

12. Defendant, Marla Stevens, denies each and every allegation of paragraph 12 for lack of information upon which to form a belief.

13. Defendant, Marla Stevens, denies each and every allegation of paragraph 13 for lack of information upon which to form a belief.

14. Defendant, Marla Stevens, denies each and every allegation of paragraph 14 for lack of information upon which to form a belief.

15. Defendant, Marla Stevens, denies each and every allegation of paragraph 15 for lack of information upon which to form a belief.

16. Defendant, Marla Stevens, denies each and every allegation of paragraph 16 for lack of information upon which to form a belief.

17. Defendant, Marla Stevens, denies each and every allegation of paragraph 17 for lack of information upon which to form a belief.

18. Defendant, Marla Stevens, denies each and every allegation of paragraph 18 for lack of information upon which to form a belief.

19. Defendant, Marla Stevens, denies each and every allegation of paragraph 19 for lack of information upon which to form a belief.

20. Defendant, Marla Stevens, denies each and every allegation of paragraph 20 for lack of information upon which to form a belief.

21. Defendant, Marla Stevens, denies each and every allegation of paragraph 21 for lack of information upon which to form a belief.

22. Defendant, Marla Stevens, denies each and every allegation of paragraph 22 for lack of information upon which to form a belief.

23. Defendant, Marla Stevens, denies each and every allegation of paragraph 23 for lack of information upon which to form a belief.

24. Defendant, Marla Stevens, denies each and every allegation of paragraph 24 for lack of information upon which to form a belief.

25. Defendant, Marla Stevens, admits that there were two accounts in her name in a bank in the State of Indiana, but denies each and every other allegation of paragraph 25 for lack of information upon which to form a belief.

26. Defendant, Marla Stevens, denies each and every allegation of paragraph 26 for lack of information upon which to form a belief.

27. Defendant, Marla Stevens, realleges and incorporates by reference her answers to the allegations as set forth in paragraph 1 through 26 above.

28. Defendant, Marla Stevens, denies each and every allegation of paragraph 28 for lack of information upon which to form a belief.

29. Defendant, Marla Stevens, denies each and every allegation of paragraph 29 for lack of information upon which to form a belief.

30. Defendant, Marla Stevens, denies each and every allegation of paragraph 30 for lack of information upon which to form a belief.

31. Defendant, Marla Stevens, realleges, by reference herein, her answers to paragraphs 1 through 30 above.

32. Defendant, Marla Stevens, denies each and every allegation of paragraph 32 for lack of information upon which to form a belief.

33. Defendant, Marla Stevens, denies each and every allegation of paragraph 33 for lack of information upon which to form a belief.

34. Defendant, Marla Stevens, denies each and every allegation of paragraph 34 for lack of information upon which to form a belief.

35. Defendant, Marla Stevens, realleges, by reference herein, her answers set forth in paragraphs 1 through 34 above.

36. Defendant, Marla Stevens, denies each and every allegation of paragraph 36 for lack of information upon which to form a belief.

37. Defendant, Marla Stevens, denies each and every allegation of paragraph 37 for lack of information upon which to form a belief.

38. Defendant, Marla Stevens, denies each and every allegation of paragraph 38 for lack of information upon which to form a belief.

39. Defendant, Marla Stevens, denies each and every allegation of paragraph 39 for lack of information upon which to form a belief.

40. Defendant, Marla Stevens, denies each and every allegation of paragraph 40 for lack of information upon which to form a belief.

41. Defendant, Marla Stevens, denies each and every allegation of paragraph 41 for lack of information upon which to form a belief.

42. Defendant, Marla Stevens, denies each and every allegation of paragraph 42 for lack of information upon which to form a belief.

43. Defendant, Marla Stevens, denies each and every allegation of paragraph 43 for lack of information upon which to form a belief.

44. Defendant, Marla Stevens, denies each and every allegation of paragraph 44 for lack of information upon which to form a belief.

45. Defendant, Marla Stevens, denies each and every allegation of paragraph 45 for lack of information upon which to form a belief.

46. Defendant, Marla Stevens, realleges, by reference herein, her answers to paragraphs 1 through 45 above.

47. Defendant, Marla Stevens, denies each and every allegation of paragraph 47 for lack of information upon which to form a belief.

48. Defendant, Marla Stevens, denies each and every allegation of paragraph 48 for lack of information upon which to form a belief.

49. Defendant, Marla Stevens, denies each and every allegation of paragraph 49 for lack of information upon which to form a belief.

50. Defendant, Marla Stevens, denies each and every allegation of paragraph 50 for lack of information upon which to form a belief.

51. Defendant, Marla Stevens, denies each and every allegation of paragraph 51 for lack of information upon which to form a belief.

52. Defendant, Marla Stevens, denies each and every allegation of paragraph 52 for lack of information upon which to form a belief.

53. Defendant, Marla Stevens, denies each and every allegation of paragraph 53 for lack of information upon which to form a belief.

54. Defendant, Marla Stevens, denies each and every allegation of paragraph 54 for lack of information upon which to form a belief.

55. Defendant, Marla Stevens, denies each and every allegation of paragraph 55 for lack of information upon which to form a belief.

56. Defendant, Marla Stevens, realleges, by reference herein, her answers to paragraphs 1 through 55 above.

57. Defendant, Marla Stevens, denies each and every allegation of paragraph 57 for lack of information upon which to form a belief.

58. Defendant, Marla Stevens, denies each and every allegation of paragraph 58 for lack of information upon which to form a belief.

59. Defendant, Marla Stevens, denies each and every allegation of paragraph 59 for lack of information upon which to form a belief.

60. Defendant, Marla Stevens, denies each and every allegation of paragraph 60 for lack of information upon which to form a belief.

61. Defendant, Marla Stevens, denies each and every allegation of paragraph 61 for lack of information upon which to form a belief.

62. Defendant, Marla Stevens, realleges, by reference herein, her answers set forth in paragraphs 1 through 61 above.

63. Defendant, Marla Stevens, denies each and every allegation of paragraph 63 for lack of information upon which to form a belief.

64. Defendant, Marla Stevens, denies each and every allegation of paragraph 64 for lack of information upon which to form a belief.

65. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 65.

66. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 66.

67. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 67.

68. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 68.

69. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 69.

70. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 70.

71. Defendant, Marla Stevens, denies each and every allegation set forth in paragraph 71 for lack of information upon which to form a belief.

WHEREFORE, Defendant, Marla Stevens, prays this court to dismiss each count of the Complaint upon which Plaintiff seeks recovery and judgment against Defendant, Marla Stevens; for a denial of the Temporary Restraining Order and Preliminary and Permanent Injunctive Relief requested by the Plaintiff; and for such other and further relief as the court deems just and equitable in the circumstances.

Respectfully submitted,



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